

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

SAMUEL JAMES SMITH, also d/b/a Weblio,
a/k/a Weblio Squeeze, *et al.*

Defendants.

Case No. 23cv4848-GAM

**JOINT MOTION OF THE FEDERAL TRADE COMMISSION AND DEFENDANT
SAMUEL J SMITH FOR ENTRY OF STIPULATED ORDER FOR
PERMANENT INJUNCTION AND MONETARY JUDGMENT**

Plaintiff, Federal Trade Commission, and Defendant Samuel J Smith jointly move for entry of the proposed Stipulated Order for Permanent Injunction and Monetary Judgment filed with this motion. Mr. Smith has agreed to the terms of and signed the proposed Stipulated Order, which will resolve all issues in this action between the moving parties. Accordingly, the Federal Trade Commission and Mr. Smith respectfully request that the Court enter the proposed Stipulated Order.

Respectfully submitted,

/s/ Samuel J Smith¹

Samuel J Smith, *pro se* defendant
sam.egglayer@gmail.com

/s/ P. Connell McNulty

P. Connell McNulty (PA Bar No. 87966)
Lauren Rivard (NY Reg. No. 5308192)
Federal Trade Commission
600 Pennsylvania Ave., NW, Mailstop CC-6316
Washington, DC 20580
McNulty: (202) 326-2061 / pmcnulty@ftc.gov
Rivard: (202) 326-2450 / lrivard@ftc.gov

Attorneys for Plaintiff, Federal Trade Commission

¹ On May 22, 2024, Samuel J Smith authorized counsel for the FTC to affix his conformed signature on this joint motion.

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2024, I caused the foregoing Joint Motion of The Federal Trade Commission and Defendant Smith for Entry of Stipulated Order for Permanent Injunction and Monetary Judgment to be served on the following via email or the Court's ECF system:

Robert William Shafer, *pro se* defendant²
Shafer116@yahoo.com
c/o Karl Kronenberger, Esq. (karl@kr.law)
Liana Chen, Esq. (liana@kr.law)
James Carlson, Esq. (james@kr.law)

Samuel J. Smith, *pro se* defendant
sam.egglayer@gmail.com

Edward M. Galang, Esq.
(PA Bar No. 80958)
MULLANEY & MULLANEY LLC
3881 Skippack Pike
P.O. Box 1368
Skippack, PA 19474-1368
Tel. (610) 584-4416
Fax (610) 584-9856
egalang@mullaneylaw.com
*Counsel for Defendants Charles Joseph
Garis, Jr. and Business Revolution Group
Inc.*

/s/ P. Connell McNulty

² Defendant Shafer is represented by Kronenberger Rosenfeld LLP of San Francisco, California, which has informed the FTC that its representation of Mr. Shafer is limited to matters involving compliance with the TRO, any subsequent court orders, and the negotiated resolution of the FTC's claims against him. The representation does not include appearing on Mr. Shafer's behalf in court proceedings. On January 24, 2024, Mr. Shafer entered his appearance, *pro se*, for in court proceedings. See ECF No. 21.